

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

AMA MULTIMEDIA, LLC, a Nevada
limited liability company,

Plaintiff,

v.

BORJAN SOLUTIONS, S.L. d/b/a
SERVIPORNO, a Spanish company;
and BORJAN MERA URRESTARAZU,
an individual,

Defendants.

Case No.: 2:15-cv-01673-JCM-GWF

DECLARATION OF TREY A. ROTHELL

I, Trey A. Rothell, declare:

1. I am over 18 years of age and have never been convicted of a crime involving fraud or dishonesty. I am employed as a paralegal for Randazza Legal Group, PLLC. I have first hand knowledge of the facts set forth herein, and if called as a witness, could and would testify competently thereto.
2. On February 2, 2016 at approximately 3:58 PM Pacific Time, at the offices of Randazza Legal Group, PLLC, 4035 S. El Capitan Way, Las Vegas, NV 89147, I navigated to the Uniform Resource Locator ("URL") <[http://www.adrservices.org/pdf/ADR%20ARBITRATION%20RULES%20\(5\)%20update%207-14-10.pdf](http://www.adrservices.org/pdf/ADR%20ARBITRATION%20RULES%20(5)%20update%207-14-10.pdf)> on the Internet using the web browser Google Chrome on an Apple MacBook Air laptop running OS X El Capitan

operating system. At that URL, I observed a PDF document entitled "Arbitration Rules." Immediately upon observing the PDF file at that URL, I saved a copy of the document to the hard drive of my computer and to Randazza Legal Group's server. A true and correct copy of the PDF file that I observed at that URL is attached as **Exhibit 1** to the Reply In Support of Motion to Compel Arbitration filed herewith.

3. On February 2, 2016 at approximately 4:03 PM Pacific Time, at the offices of Randazza Legal Group, PLLC, 4035 S. El Capitan Way, Las Vegas, NV 89147, I navigated to the Uniform Resource Locator ("URL") <<http://bongiovi.com/practice-areasfees/>> on the Internet using the web browser Google Chrome on an Apple MacBook Air laptop running OS X El Capitan operating system. At that URL, I observed a webpage entitled "Practice Areas/Fees." Immediately upon observing the webpage at that URL, I saved a PDF image of the webpage to the hard drive of my computer and to Randazza Legal Group's server. A true and correct copy of the PDF file that I observed at that URL is attached as **Exhibit 2** to the Reply In Support of Motion to Compel Arbitration filed herewith.

4. On February 2, 2016 at approximately 4:04 PM Pacific Time, at the offices of Randazza Legal Group, PLLC, 4035 S. El Capitan Way, Las Vegas, NV 89147 I navigated to the Uniform Resource Locator ("URL") <<http://www.nadn.org/PDF/Ara-Shirinian.pdf>> on the Internet using the web browser Google Chrome on an Apple MacBook Air laptop running OS X El Capitan operating system. At that URL, I observed a PDF document entitled "Ara Shirinian Mediation." Immediately upon observing the PDF file at that URL, I saved a copy of the document to the hard drive of my computer and to Randazza Legal Group's server. A true and correct copy of the PDF file that I observed at that URL is attached as

1 **Exhibit 3** to the Reply In Support of Motion to Compel Arbitration filed
2 herewith.

3 5. On February 2, 2016 at approximately 4:05 PM Pacific Time, at the offices
4 of Randazza Legal Group, PLLC, 4035 S. El Capitan Way, Las Vegas, NV
5 89147, I navigated to the Uniform Resource Locator ("URL")
6 <<http://www.nadn.org/PDF/Joe-Bongiovi.pdf>> on the Internet using the
7 web browser Google Chrome on an Apple MacBook Air laptop running
8 OS X El Capitan operating system. At that URL, I observed a PDF
9 document entitled "Bongiovi Dispute Resolutions." Immediately upon
10 observing the PDF file at that URL, I saved a copy of the document to the
11 hard drive of my computer and to Randazza Legal Group's server. A true
12 and correct copy of the PDF file that I observed at that URL is attached as
13 **Exhibit 4** to the Reply In Support of Motion to Compel Arbitration filed
14 herewith.

15 6. On February 2, 2016 at approximately 4:05 PM Pacific Time, at the offices
16 of Randazza Legal Group, PLLC, 4035 S. El Capitan Way, Las Vegas, NV
17 89147, I navigated to the Uniform Resource Locator ("URL")
18 <[http://www.adrservices.org/pdf/JAMP%20\(Vegas\)%208.07.pdf](http://www.adrservices.org/pdf/JAMP%20(Vegas)%208.07.pdf)> on the
19 Internet using the web browser Google Chrome on an Apple MacBook Air
20 laptop running OS X El Capitan operating system. At that URL, I observed
21 a PDF document entitled "ADR Services, Inc. Nevada Mediation &
22 Arbitration Panel." Immediately upon observing the PDF file at that URL, I
23 saved a copy of the document to the hard drive of my computer and to
24 Randazza Legal Group's server. A true and correct copy of the PDF file
25 that I observed at that URL is attached as **Exhibit 5** to the Reply In Support
26 of Motion to Compel Arbitration filed herewith.

7. On February 2, 2016 at approximately 4:06 PM Pacific Time, at the offices of Randazza Legal Group, PLLC, 4035 S. El Capitan Way, Las Vegas, NV 89147, I navigated to the Uniform Resource Locator ("URL") <<http://www.adrservices.org/pdf/Romero,%20Enrique.pdf>> on the Internet using the web browser Google Chrome on an Apple MacBook Air laptop running OS X El Capitan operating system. At that URL, I observed a PDF document entitled "Hon. Enrique Romero." Immediately upon observing the PDF file at that URL, I saved a copy of the document to the hard drive of my computer and to Randazza Legal Group's server. A true and correct copy of the PDF file that I observed at that URL is attached as **Exhibit 6** to the Reply In Support of Motion to Compel Arbitration filed herewith.

8. On February 2, 2016 at approximately 4:07 PM Pacific Time, at the offices of Randazza Legal Group, PLLC, 4035 S. El Capitan Way, Las Vegas, NV 89147, I navigated to the Uniform Resource Locator ("URL") <<http://www.ifta-online.org/ifta-panel-arbitrators>> on the Internet using the web browser Google Chrome on an Apple MacBook Air laptop running OS X El Capitan operating system. At that URL, I observed a webpage entitled "IFTA Panel of Arbitrators." Immediately upon observing the webpage at that URL, I saved a PDF image of the webpage to the hard drive of my computer and to Randazza Legal Group's server. A true and correct copy of the webpage that I observed at that URL is attached as **Exhibit 7** to the Reply In Support of Motion to Compel Arbitration filed herewith.

9. On February 2, 2016 at approximately 4:07 PM Pacific Time, at the offices of Randazza Legal Group, PLLC, 4035 S. El Capitan Way, Las Vegas, NV 89147, I navigated to the Uniform Resource Locator ("URL")

1 <http://www.ifta-online.org/sites/default/files/Levy_0.pdf> on the Internet
 2 using the web browser Google Chrome on an Apple MacBook Air laptop
 3 running OS X El Capitan operating system. At that URL, I observed a PDF
 4 document entitled "Anat Levy, Esq." Immediately upon observing the
 5 PDF file at that URL, I saved a copy of the document to the hard drive of
 6 my computer and to Randazza Legal Group's server. A true and correct
 7 copy of the PDF file that I observed at that URL is attached as **Exhibit 8** to
 8 the Reply In Support of Motion to Compel Arbitration filed herewith.

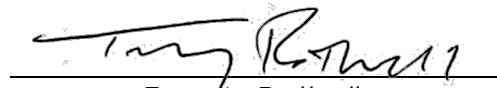
9 10. On February 2, 2016 at approximately 4:09 PM Pacific Time, at the offices
 10 of Randazza Legal Group, PLLC, 4035 S. El Capitan Way, Las Vegas, NV
 11 89147, I navigated to the Uniform Resource Locator ("URL")
 12 <[https://www.adr.org/aaa/faces/s/contact/us?state=NV&name=Nevada
 13 &_afzLoop=69383781686768&_afzWindowMode=0&_afzWindowId=kv69ifzj
 14 w_248#%40%3F_afzWindowId%3Dkv69ifzjw_248%26_afzLoop%3D693837816
 15 86768%26state%3DNV%26name%3DNevada%26_afzWindowMode%3D0%2
 16 6_adf.ctrl-state%3Dkv69ifzjw_292](https://www.adr.org/aaa/faces/s/contact/us?state=NV&name=Nevada&_afzLoop=69383781686768&_afzWindowMode=0&_afzWindowId=kv69ifzjw_248#%40%3F_afzWindowId%3Dkv69ifzjw_248%26_afzLoop%3D69383781686768%26state%3DNV%26name%3DNevada%26_afzWindowMode%3D0%26_adf.ctrl-state%3Dkv69ifzjw_292)> on the Internet using the web browser
 17 Google Chrome on an Apple MacBook Air laptop running OS X El Capitan
 18 operating system. At that URL, I observed a webpage entitled "Contact
 19 Us." Immediately upon observing the webpage at that URL, I saved a PDF
 20 duplicate of the webpage to the hard drive of my computer and to
 21 Randazza Legal Group's server. A true and correct copy of the webpage
 22 that I observed at that URL is attached as **Exhibit 9** to the Reply In Support
 23 of Motion to Compel Arbitration filed herewith.

24 11. On February 2, 2016 at approximately 4:10 PM Pacific Time, at the offices
 25 of Randazza Legal Group, PLLC, 4035 S. El Capitan Way, Las Vegas, NV
 26 89147, I navigated to the Uniform Resource Locator ("URL")
 27 <<https://www.citizen.org/documents/ACF110A.PDF>> on the Internet using

1 the web browser Google Chrome on an Apple MacBook Air laptop
2 running OS X El Capitan operating system. At that URL, I observed a PDF
3 document entitled "The Costs of Arbitration." Immediately upon
4 observing the PDF file at that URL, I saved a copy of the document to the
5 hard drive of my computer and to Randazza Legal Group's server. A true
6 and correct copy of the PDF file that I observed at that URL is attached as
7 **Exhibit 10** to the Reply In Support of Motion to Compel Arbitration filed
8 herewith.

9 12. On February 2, 2016 at approximately 4:11 PM Pacific Time, at the offices
10 of Randazza Legal Group, PLLC, 4035 S. El Capitan Way, Las Vegas, NV
11 89147, I navigated to the Uniform Resource Locator ("URL")
12 <<https://www.citizen.org/documents/ACF110A.PDF>> on the Internet using
13 the web browser Google Chrome on an Apple MacBook Air laptop
14 running OS X El Capitan operating system. At that URL, I observed a PDF
15 document entitled "ADR Services, Inc. Nevada Mediation & Arbitration
16 Panel." Immediately upon observing the PDF file at that URL, I saved a
17 copy of the document to the hard drive of my computer and to
18 Randazza Legal Group's server. A true and correct copy of the PDF file
19 that I observed at that URL is attached as **Exhibit 11** to the Reply In
20 Support of Motion to Compel Arbitration filed herewith.

21 I declare under penalty of perjury under the laws of the State of Nevada that
22 the foregoing is true and correct. Executed on February 2, 2016, in Las Vegas,
23 Nevada.

24
25
26 
27 Trey A. Rothell